E-filed August 11, 2009 Parsons Behle & Latimer 1 Rew R. Goodenow, Bar No. 3722 50 West Liberty Street, Suite 750 2 Reno, NV 89501 Telephone: 3 (775) 323-1601 Facsimile: (775) 348-7250 4 Attorneys for Celtic Bank 5 6 7 8 UNITED STATES BANKRUPTCY COURT 9 DISTRICT OF NEVADA 10 CASE No. BK-09-21928-MKN 11 IN RE: 12 TERESA MURPHY, (Chapter 7) 13 Debtor. 14 15 16 17 REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULE 2002 18 19 PLEASE TAKE NOTICE that Rew R. Goodenow of PARSONS BEHLE & LATIMER, 20 on behalf of Celtic Bank, successor in interest to Silver State Bank, hereby requests, pursuant to 21 Bankruptcy Rule 2002, special notice of all motions, applications, hearings, orders, writings, 22 proceedings, and the like in the above-captioned matters including, but not limited to, the 23 following: 24 All matters and papers which must be sent to creditors, equity security holders, or (a) 25 the unsecured creditors' committee; 26 All matters regarding relief from the automatic stay under Section 362 of the (b) 27 Bankruptcy Code; 28 **PARSONS**

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- (c) All matters regarding the use, the sale, or the lease of the Debtor's property under Section 363 of the Bankruptcy Code;
- (d) All matters regarding the obtaining of credit under Section 364 of the Bankruptcy Code;
- (e) All matters regarding executory contracts and unexpired leases under Section 365 of the Bankruptcy Code;
 - (f) All matters regarding the time requirements to file claims against the Debtor;
- (g) All matters regarding reorganization of the Debtor, including a copy of any disclosure statement or plan or reorganization;
 - (h) All matters regarding any adversary proceeding filed by or against the Debtor; and
 - (i) All documents filed by any party in any adversary proceeding.

Neither this request for notice, nor any subsequent appearance, pleadings, claim, proof of claim, document, suit, motion, or any other writing or conduct shall constitute a waiver by these creditors of the following rights:

- (a) Right to have any final orders in any non-core matters entered only after de novo review by a United States District Judge;
- (b) Right to trial in any proceeding in which this right exists, whether the right be designed legal or private, whether the right is asserted in any related case, controversy or proceeding, notwithstanding the designation *vel non* of the proceeding as "core" under 28 U.S.C. Section 157(b)(2)(H), and whether the right is asserted under statute or the United States Constitution;
- (c) Right to have the United States District Court withdraw the reference of this matter in any proceeding subject to mandatory or discretionary withdrawal; or
- (d) Other rights, claims, actions, defenses, set-offs, recoupments, or other matters to which this party is entitled under any agreements, at law or in equity, or under the United States Constitution.

Filing this request for notice or participating in this bankruptcy proceeding shall not be deemed to constitute a concession or admission of jurisdiction in this case or before this Court.

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| 1 | Celtic Bank further requests that all such notices be addressed to it as follows: |
| 2 | Rew R. Goodenow PARSONS BEHLE & LATIMER |
| 3 | 50 W. Liberty Street, Suite 750 Reno, NV 89501 |
| 4 | (775) 323-1601 |
| 5 | (775) 348-7250 (Facsimile) Email: rgoodenow@parsonsbehle.com |
| 6 | |
| 7 | Dated: August 11, 2009 PARSONS BEHLE & LATIMER |
| 8 | By: De Boode |
| 9 | Rew R. Goodenow, |
| 10 11 | Attorneys for Celtic Bank |
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CERTIFICATE OF SERVICE 1 I hereby certify that on this / day of August, 2009, I caused to be filed and served 2 through the Bankruptcy Court's ECF system, a true and correct copy of the foregoing REQUEST 3 4 FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULE 2002, to: 5 Timothy S. Cory 8831 W. Sahara Ave. 6 Lakes Business Park Las Vegas, NV 89117 7 Tim.cory@corylaw.us Trustee 8 Lenard E. Schwartzer 9 Schwartzer & McPherson Law Firm 2850 W. Jone Blvd., Suite 1 10 Las Vegas, NV 89146 bkfilings@s-mlaw.com 11 Attorney for Debtor Teresa Murphy 12 Recovery Management Systems Corporation 25 S.E. Second Avenue 13 Ingraham Building, Suite 1120 Miami, FL 33131-1605 14 claims@recoverycorp.com 15 Cindy lee Stock 915 É. Bonneville Ave. 16 Las Vegas, NV 89101 Bk-clstock@cox.net 17 Attorney for Creditor Washington Mutual Bank 18 U.S. Trustee -LV - 7300 Las Vegas Blvd S. 19 **Suite 4300** Las Vegas, NV 89101 20 USTPRegion17.lv.ecf@usdoj.gov 21 22 ee of Parsons Behle & Latimer 23 24 2.5 26 27 28